

USPTO Serial Number: 10/729,136

Kunani, N.

Response to Office Action dated July 26, 2005

REMARKS

**Response to the Objection to The Drawings**

The Office Action objects to the drawings on the grounds that the drawings did not visually depict multiple trays, as set forth in Claims 2 and 11. Applicant has cancelled Claims 2 and 11, pursuant to the Examiner's suggestion.

**Response to the §102(b) Rejection**

The Office Action rejects claims 1, 3-10, and 12-20 under 35 U.S.C. 102(b) as being anticipated by Campbell. Applicant has amended each of the independent Claims (Claims 1, 6 and 15), as well as certain corresponding dependent Claims, to more clearly distinguish over the prior art references.

Claim 1

Claim 1, as amended, recites a steamatory for preparing a body for burial comprising a chamber having a door on one side of the chamber. A tray slides in and out of the chamber through the door. A plurality of rollers facilitate the sliding of the tray in and out of the door. A plurality of steam jets line an interior wall of the chamber. A steam generator provides steam to the plurality of steam jets lining an interior wall of the chamber. The steam injected into the chamber causes tissue of the body to separate from bone structure.

The Campbell reference discloses a cabinet for keeping food warm for up to a two hour period, and a steam chest. The cabinet in Campbell contains a lid hinged to the cabinet, a tray for receiving dishes or plates of food, a dripping pan, and legs to support the cabinet. The steam chest in Campbell is connected to the bottom of the cabinet through a T-union, and is connected near the top of the cabinet through a pipe connection.

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The Campbell reference does not disclose a chamber having a door on one side. The Campbell reference also does not disclose a tray that slides in and out of the chamber, nor a plurality of rollers facilitating the sliding of the tray in and out of the door. For example, the side door in Applicant's invention is distinguishable from the lid in Campbell which (i) is hinged at the top of the cabinet and (ii) does not allow for horizontal movement into the cabinet.

The tray and plurality of wheels in Applicant's invention are also distinguishable from the tray "carried in" the box in Campbell (presumably for cleaning). The Campbell reference does not disclose a tray that slides in and out of the cabinet, nor a plurality of wheels to facilitate the sliding. Nor does the Campbell reference disclose a tray that can be used to transport a body or other heavy object in and out of the cabinet. Instead, the language in Campbell implies that the tray is already in the cabinet when the food is added. According to the Campbell reference: "As soon as the chest has been sufficiently heated by the steam and the hot water, the food is placed on tray K and the lid closed", see Campbell column 2, lines 98-103.

In contrast, the side door, sliding tray and plurality of wheels in Applicant's invention allow for proper care and handling of a body for burial preparation, given the weight of the human body, as well as the desire to handle the body with appropriate dignity and respect, and with minimal handling.

The Campbell reference also does not disclose a plurality of steam jets lining an interior wall of the chamber. Applicant's steam jets are distinguishable from the T-union and pipe connection disclosed in Campbell. The T-union and pipe connection in Campbell merely maintain the temperature of food

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that has already been cooked, see Campbell column 1, lines 9-14 and 29-32, and column 2, lines 98-103 and 106. The T-union and pipe connection in Campbell do not provide close contact between the source of the steam and the item being warmed. In contrast, Applicant's plurality of steam jets lining an interior wall of the chamber allows for closer contact between the source of the steam and the body, as well as closer contact among various points along the surface of the body. Applicant's steam jets also allow for the temperature of the body to increase significantly in order to separate the tissue from bone structure, rather than merely maintaining a particular temperature as in Campbell.

Campbell is further distinguished in that the reference pertains to the warming of food, and not to the preparation of a human body for burial, and that there is no suggestion or teaching regarding the preparation of a body for burial.

Accordingly, for the reasons set forth above, Applicant respectfully asserts that Claim 1 is patentably distinguishable over Campbell.

#### Claims 3-5

Claims 3-5 are believed to be in condition for allowance as each is dependent from an allowable base claim. Applicant also notes that an additional limitation has been added to Claim 4, namely a funnel that is distinguishable from the dripping boards disclosed in Campbell.

#### Claim 6

Claim 6, as amended, recites an apparatus for preparing a body for burial comprising a vessel having a door for entry and exit of the body. A support structure is disposed within the vessel for supporting the body. The support structure is

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slidable on a plurality of rollers. A plurality of steam jets line an interior wall of the vessel. The steam injected into the vessel causes tissue of the body to separate from bone structure. A cart supports the vessel. A plurality of wheels are used for moving the cart, the vessel and any contents therein.

The Campbell reference does not teach or suggest a vessel having a door for entry and exit of the body, nor a support structure disposed within the vessel for supporting the body, wherein the support structure is slidable on a plurality of rollers.

The Campbell reference further does not disclose a plurality of steam jets lining an interior wall of a vessel. Applicant's steam jets are distinguishable from the T-union and pipe connection disclosed in Campbell. As discussed above with respect to Claim 1, the T-union and pipe connection in Campbell merely maintain the temperature of food that has already been cooked, and do not provide close contact between the source of the steam and the item being warmed. In contrast, Applicant's plurality of steam jets lining an interior wall of the vessel allows for closer contact between the source of the steam and the body, as well as closer contact at various points along the surface of the body. Applicant's steam jets also allow for the temperature of the body to increase significantly in order to separate the tissue from bone structure, rather than merely maintaining a particular temperature as in Campbell.

Campbell also does not disclose a cart for supporting the vessel, nor a plurality of wheels for transporting the cart, the vessel, and its contents. These elements of Applicant's invention allow for easier movement of the body, and with minimal handling.

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As noted above, Campbell is further distinguished in that the reference pertains to the warming of food, and not the preparation of a human body for burial, and that there is no suggestion or teaching regarding the preparation of a body for burial.

Accordingly, for the reasons set forth above, Applicant respectfully asserts that Claim 6 is patentably distinguishable over Campbell.

Claims 7, 9-10 and 12-14

Claims 7, 9-10 and 12-14 are believed to be in condition for allowance as each is dependent from an allowable base claim. In addition, Applicant notes that an additional limitation has been added to Claim 13, namely a funnel that is distinguishable from the dripping boards disclosed in Campbell.

Claim 15

Claim 15, as amended, recites a method of preparing a body for burial, comprising the steps of providing a vessel with a door for entry and exit of the body, placing the body on a slidable tray supported by a plurality of rollers, rolling the tray containing the body into the vessel through the door, and injecting steam through a plurality of steam jets lining an interior wall of the vessel to cause tissue of the body to separate from bone structure.

The Campbell reference does not disclose any methods pertaining to the preparation of a body for burial. Nor does the Campbell disclose any methods for removing flesh from the bone structure of humans or animals. The Campbell reference merely discloses an apparatus for warming food, after the food is cooked.

In addition, as discussed above, Campbell does not disclose

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any methods for containing a human body, or for sliding the tray and its contents into and out of the vessel on rollers, as are recited in Applicant's invention. These elements of Applicant's method allow for the movement of the body with minimal handling.

The Campbell reference also does not disclose the separation of tissue from the bone structure of a human body, nor the separation of tissue from the bone structure of animals. The Campbell reference refers only to "drippings" from the pre-cooked food, see Campbell, column 1, lines 18-21. The reference to "drippings" could not refer to the removal of the flesh or food itself - otherwise, the food would be lost, defeating the purpose of the warming cabinet which is to maintain the temperature and tenderness of the food for consumption.

The Campbell reference also does not disclose injecting steam through a plurality of steam jets lining an interior wall of the vessel to cause tissue of the body to separate from bone structure. Applicant's method is thus readily distinguishable from Campbell's method of maintaining the temperature of food, for example, due to (i) the method's applicability to a human body, (ii) the preparation for burial as opposed to preservation for consumption, (iii) the capability of more direct contact between the body and the steam sources, (iv) the increased temperature, and (v) the resulting separation of the tissue from the bone structure.

Accordingly, for the reasons set forth above, Applicant respectfully asserts that Claim 15 is patentably distinguishable over Campbell.

Claims 16, 18-20

Claims 16 and 18-20 are believed to be in condition for allowance as each is dependent from an allowable base claim.

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**Response to the \$103 Rejection**

The Office Action rejects claims 2 and 11 under 35 U.S.C. 103 as being unpatentable over Campbell in view of Muse. Applicant has cancelled Claims 2 and 11, as referenced in the discussion above pertaining to the objection to the drawings.

**Concluding Remarks**

Applicant believes that all information and requirements for the application have been provided to the USPTO. If there are matters that can be discussed by telephone to further the prosecution of the Application, Applicant invites the Examiner to call the undersigned attorney at the Examiner's convenience.

The Commissioner is hereby authorized to charge any fees due with this Response to U.S. PTO Account No. 17-0055.

Respectfully submitted,  
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